

November 21, 2002

RE: Vestil Manufacturing Corporation 151-15780-00035

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Vestil Manufacturing Corporation
2999 North Wayne Street
Angola, Indiana 46703**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F151-15780-00035	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 21, 2002

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Quarterly Deviation and Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary material handling and loading equipment manufacturing plant.

Authorized Individual:	President
Source Address:	2999 North Wayne Street, Angola, Indiana 46703
Mailing Address:	P.O. Box 507, Angola, Indiana 46703
General Source Phone:	219-882-1640
SIC Code:	3499
Source Location Status:	Steuben
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) spray paint booth, identified as B1, with a maximum capacity of 10 metal curbs per hour and a maximum paint usage of 0.2 gallons per curb, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, and exhausting to stack V1.
- (b) Three (3) spray paint booths, identified as B2, B3, and B4, each with a maximum capacity of 2 steel yard ramps per hour and a maximum paint usage of 4.0 gallons per ramp, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, and exhausting to stacks V2, V3, and V4, respectively.
- (c) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour and a combined maximum glue usage of 0.2 gallons per unit, each utilizing a spray gun application, and exhausting into the building.
- (d) One (1) radial cross-cut woodsaw, identified as FS1, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) baghouse, and exhausting into the building.
- (e) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, and exhausting into the building.
- (f) One (1) routing woodsaw, identified as FS3, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, and exhausting into the building.

- (g) Fifty-one (51) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, and exhausting into the building.
- (h) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, and exhausting into the building.
- (i) Forty-one (41) oxyacetylene flame-cutting operations, each with a maximum cutting rate of 11.7 inches per minute for 0.75 inches thick steel, and exhausting into the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) Nine (9) natural gas-fired furnaces (identified as T2 through T8, and T14 through T16), each with a maximum heat input rate of 0.4 MMBtu/hr, and exhausting through stacks S2 through S8, and S14 through S16, respectively.
 - (2) Five (5) natural gas-fired furnaces (identified as C9 through C13), each with a maximum heat input rate of 0.154 MMBtu/hr, and exhausting through stacks S9 through S13, respectively.
 - (3) One (1) natural gas-fired heater, identified as W1, with a maximum heat input rate of 0.034 MMBtu/hr, and exhausting through stack WH1.
 - (4) One (1) natural gas-fired heater, identified as W2, with a maximum heat input rate of 0.44 MMBtu/hr, and exhausting through stack WH2.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour, including four (4) propane-fired fork lift trucks, identified as FT1 through FT4, with a total capacity of 56,000 Btu/hr.
- (c) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa (15mm Hg or 0.3 psi) measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa (5mm Hg or 0.1 psi) measured at 20°C (68°F). The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs, including one (1) metal working shop, consisting of miscellaneous drills and cutting equipment, and exhausting inside the building.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document

is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM OAQ:

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

The Northern Regional Office:

Telephone No.: 1-800-753-5519, or
Telephone No.: 219-245-4870
Facsimile No.: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (i) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (j) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or

- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously

submitted a request for an administrative amendment to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) spray paint booth, identified as B1, with a maximum capacity of 10 metal curbs per hour and a maximum paint usage of 0.2 gallons per curb, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, and exhausting to stack V1.
- (b) Three (3) spray paint booths, identified as B2, B3, and B4, each with a maximum capacity of 2 steel yard ramps per hour and a maximum paint usage of 4.0 gallons per ramp, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, and exhausting to stacks V2, V3, and V4, respectively.
- (c) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour and a combined maximum glue usage of 0.2 gallons per unit, each utilizing a spray gun application, and exhausting into the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP [326 IAC 2-8-4]

Pursuant to FESOP 151-8993-00035, issued on March 25, 1998 and 326 IAC 2-8-4 (FESOP):

- (a) The amount of VOC delivered to all the spray painting booths, the glue application stations, and their associated clean-up activities shall not exceed a total of 98.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any single HAP delivered to all the spray painting booths and the glue application stations plus the amount of any single HAP used for clean-up shall not exceed 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to all the spray painting booths and the glue application stations plus the amount of any combination of HAPs used for clean-up shall not exceed 23.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with the emissions from the woodworking, welding and flame cutting operations, and the insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year each, and the HAP emissions are limited to less than 10 tons per year for any single HAP, and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-6.1, 326 IAC 2-7 and 326 IAC 2-2 (PSD) (40 CFR 52.21) are not applicable.

D.1.2 Volatile Organic Compounds [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) that applies extreme performance coatings pounds of VOC per gallon of coating excluding water, delivered to a coating applicator.

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from each of the spray booths (B1, B2, B3, and B4) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.5 VOC and HAP Emissions

Compliance with Conditions D.1.1(a), (b), (c) shall be demonstrated within 30 days of the end of each month based on the total VOC and HAP usage for the most recent twelve (12) month period.

D.1.6 VOC and HAP Emissions

- (a) Compliance with the VOC usage limitation contained in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the HAP usage limitations contained in Conditions D.1.1(b) and (c) shall be determined using formulation data supplied by the coating manufacturer.

D.1.7 Particulate [326 IAC 6-3-2 (d)]

Pursuant to 326 IAC 6-3-2(d) and in order to comply with D.1.3, the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the four (4) spray booths (B1, B2, B3 and B4) at all times when these spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray painting booth stacks (V1, V2, V3, and V4) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance

Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), D.1.1(b), D.1.1(c) and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1(a), D.1.1(b), and D.1.1(c), and the VOC content limit contained in Condition D.1.2.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month ;
 - (5) The total HAP and VOC usage for each month; and
 - (6) The weight of VOC and HAP usage for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a), (b), and (c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (d) One (1) radial cross-cut woodsaw, identified as FS1, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) baghouse, and exhausting into the building.
- (e) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, and exhausting into the building.
- (f) One (1) routing woodsaw, identified as FS3, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, and exhausting into the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from each of the woodworking operations shall not exceed 0.39 pounds per hour when operating at a process weight rate of 60 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Emissions

In order to comply with Condition D.2.1, the baghouses and cyclones used for particulate control shall be in operation at all times when the woodsaws are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts from baghouses and cyclones shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.5 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere.

D.2.6 Cyclone Inspections

An inspection shall be performed within the last month of each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the stack exhausts from the baghouses and cyclones when venting to the atmosphere.
- (b) To document compliance with Conditions D.2.5 and D.2.6, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.5 and D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (g) Fifty-one (51) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, and exhausting into the building.
- (h) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, and exhausting into the building.
- (i) Forty-one (41) oxyacetylene flame-cutting operations, each with a maximum cutting rate of 11.7 inches per minute for 0.75 inches thick steel, and exhausting into the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Manufacturing Processes), the allowable particulate emissions from each of the welding and flame-cutting processes shall not exceed the allowable emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: 151-15780-00035

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: 151-15780-00035

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two **(2)** working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: 151-15780-00035
Facility: Four (4) painting booths (B1, B2, B3, and B4) and two (2) glue application stations
Parameter: Total VOC delivered to the applicators and used for clean-up
Limit: Less than 98.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: 151-15780-00035
Facility: Four (4) painting booths (B1, B2, B3, and B4) and two (2) glue application stations
Parameter: A single HAP delivered to the applicators and used for clean-up
Limit: Less than 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: 151-15780-00035
Facility: Four (4) painting booths (B1, B2, B3, and B4) and two (2) glue application stations
Parameter: Total HAPs delivered VOC delivered to the applicators and used for clean-up
Limit: Less than 23.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: 151-15780-00035

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit

Source Background and Description

Source Name: Vestil Manufacturing Corporation
Source Location: 2999 North Wayne Street, Angola, Indiana 46703
County: Steuben
SIC Code: 3499
Operation Permit No.: F151-15780-00035
Permit Reviewer: ERG/YC

On October 2, 2002 the Office of Air Quality (OAQ) had a notice published in the Herald Republican, Angola, Indiana, stating that Vestil Manufacturing Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) renewal relating to the operation of a stationary material handling and loading equipment manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. A general phone number is used because it is cumbersome to do a notice only change every time a contact person's phone number changes. "County Status" has been deleted; it was not removed previously when replaced by "Source Location Status" in order to clarify when only portions of a county are non-attainment. The following change was made to section A.1:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary material handling and loading equipment manufacturing plant.

Authorized Individual: President
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
General Source Phone: 219-882-1640
SIC Code: 3499
Source Location Status: Steuben
~~County Status:~~ Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

2. The term of permit rule cite was added to B.3 Permit Term. In order to avoid confusion for renewals as to what "original" date we are referring to the following change has been made:

B.3 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance date of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

3. Since B.8 (c) Duty to Supplement and Provide Information already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity. Also, the condition was revised to change a rule reference. Subpart (c) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.~~ [326 IAC 2-8-4(5)(E)]

(c) **For information furnished by the Permittee to IDEM, OAQ**, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

4. Condition B.10 Compliance with Permit Conditions was changed was revised as follows:

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in ~~condition~~ **Section B**, Emergency Provisions.

5. Condition B.13 Preventive Maintenance Plan has been revised to clarify the extension of PMPs.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

6. The requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from B.15 to B.14. B.14 Emergency Provisions the statement at the end of (b)(4) has been removed, because this is stated again in (f).

B.14 Emergency Provisions [326 IAC 2-8-12]

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM OAQ:

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

The Northern Regional Office:

Telephone No.: 1-800-753-5519, or

Telephone No.: 219-245-4870

Facsimile No.: 219-245-4877

~~Failure to notify IDEM, OAQ, and the Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been~~

~~discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]~~

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

7. Condition B.15(c) has been removed then revised and incorporated in B.12 Emergency Provisions.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- ~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

8. Condition B.18 Permit Amendment or Revision has been revised to replace "should" with "shall" in (b).

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

9. In order to be consistent with 326 IAC 2-8-15(a)(5) the rule cite has been revised in B.19(a)(5) B.19 Operational Flexibility. (b) has been removed, because this is a Part 70 requirement, but not a FESOP requirement.

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- ~~(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:~~

- ~~(1) A brief description of the change within the source;~~
- ~~(2) The date on which the change will occur;~~
- ~~(3) Any change in emissions; and~~
- ~~(4) Any permit term or condition that is no longer applicable as a result of the change.~~
- ~~The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

10. B.22 (c) Transfer of Ownership or Operational Control rule cite has been corrected.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

11. 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-8; therefore, this rule cite is being added to B.23. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4320** (ask for OAQ, Technical Support and Modeling Section **I/M & Billing Section**), to determine the appropriate permit fee.

12. C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour has been added. All Section C conditions are renumbered.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

1. Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

2. Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

13. C.9(e) Asbestos Abatement Projects has been revised to correct the rule cite.

C.89 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-~~41~~ emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

14. The following was added to Condition C.11 Compliance Requirements to state what OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements:

C.4011 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11**. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

15. Condition C.15 (e) Compliance Response Plan - Preparation, Implementation, Records, and Reports the rule cite was corrected.

C.4516 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of ~~326 IAC 2-7-16~~ **326 IAC 2-8-12**(Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

16. Condition C.19 (d) General Reporting Requirements has been revised to indicate all forms instead of the choice between quarterly or semi-annual.

C.4819 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (d) Unless otherwise specified in this permit, ~~any quarterly~~ **all reports** required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The report does~~ **All reports do** require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

17. The new VOC record keeping requirements language has been incorporated into D.1.9.

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), D.1.1(b), D.1.1(c) and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (~~3~~ **6**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1(a), D.1.1(b), and D.1.1(c), and the VOC content limit contained in Condition D.1.2.

- (1) ~~The amount, VOC content, and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 2. **The amount of coating material and solvent less water used on daily basis.**
 - (A) **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
 - (3) **The volume weighted VOC content of the coatings used for each month;**
 - (4) **The cleanup solvent usage for each month ;**
 - (25) The total HAP and VOC usage for each month; and
 - (36) The weight of VOC and HAP usage for each compliance period.
18. In Condition D.2.1 the rule cite and name were corrected.
- D.2.1 Particulate [326 IAC 6-3-2]
-
- Pursuant to 326 IAC 6-3-2(e) (**Particulate Emission Limitations for Manufacturing Processes**), the allowable particulate emissions from each of the woodworking operations shall not exceed 0.39 pounds per hour when operating at a process weight rate of 60 pounds per hour.
19. Additional information was added to Condition D.2.7 Broken or Failed Bag to describe when a failed unit will be shut down.
- D.2.7 Broken or Failed Bag Detection
-
- In the event that bag failure has been observed:
- (b) For single compartment baghouses, **if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
20. The first box on the Emergency Occurrence Report form was revised to include the word "working" in order to be consistent with 326 IAC 2-8-12(b)(5) and the Emergency Provision.

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Vestil Manufacturing Corporation
Angola, Indiana
Permit Reviewer: ERG/YC

Page 8 of 8
OP No. F151-15780-00035

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: 151-15780-00035

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</p> |
|---|

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name: Vestil Manufacturing Corporation
Source Location: 2999 North Wayne Street, Angola, Indiana 46703
County: Steuben
SIC Code: 3499
Operation Permit No.: F151-15780-00035
Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Vestil Manufacturing Corporation relating to the operation of a stationary material handling and loading equipment manufacturing plant. Vestil Manufacturing Corporation was issued FESOP 151-8993-00035 on March 25, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) spray paint booth, identified as B1, with a maximum capacity of 10 metal curbs per hour and a maximum paint usage of 0.2 gallons per curb, equipped with High Volume Low Pressure (HVLV) spray guns, using dry filters for overspray control, and exhausting to stack V1.
- (b) Three (3) spray paint booths, identified as B2, B3, and B4, each with a maximum capacity of 2 steel yard ramps per hour and a maximum paint usage of 4.0 gallons per ramp, equipped with High Volume Low Pressure (HVLV) spray guns, using dry filters for overspray control, and exhausting to stacks V2, V3, and V4, respectively.
- (c) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour and a combined maximum glue usage of 0.2 gallons per unit, each utilizing a spray gun application, and exhausting into the building.
- (d) One (1) radial cross-cut woodsaw, identified as FS1, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) baghouse, and exhausting into the building.
- (e) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, and exhausting into the building.
- (f) One (1) routing woodsaw, identified as FS3, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, and exhausting into the building.

- (g) Fifty-one (51) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, and exhausting into the building.
- (h) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, and exhausting into the building.
- (i) Forty-one (41) oxyacetylene flame-cutting operations, each with a maximum cutting rate of 11.7 inches per minute for 0.75 inches thick steel, and exhausting into the building.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new emission units and pollution control equipment proposed for this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) Nine (9) natural gas-fired furnaces (identified as T2 through T8, and T14 through T16), each with a maximum heat input rate of 0.4 MMBtu/hr, and exhausting through stacks S2 through S8, and S14 through S16, respectively.
 - (2) Five (5) natural gas-fired furnaces (identified as C9 through C13), each with a maximum heat input rate of 0.154 MMBtu/hr, and exhausting through stacks S9 through S13, respectively.
 - (3) One (1) natural gas-fired heater, identified as W1, with a maximum heat input rate of 0.034 MMBtu/hr, and exhausting through stack WH1.
 - (4) One (1) natural gas-fired heater, identified as W2, with a maximum heat input rate of 0.44 MMBtu/hr, and exhausting through stack WH2.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour, including four (4) propane-fired fork lift trucks, identified as FT1 through FT4, with a total capacity of 56,000 Btu/hr.
- (c) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa (15mm Hg or 0.3 psi) measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa (5mm Hg or 0.1 psi) measured at 20°C (68°F). The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per

year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs, including one (1) metal working shop, consisting of miscellaneous drills and cutting equipment, and exhausting inside the building.

Existing Approvals

- (a) FESOP 151-8993-00035, issued on March 25, 1998.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on June 24, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 10).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	207.4
PM-10	207.4
SO ₂	0.01
VOC	120.5
CO	1.79
NO _x	2.16

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Dibutyl Phthalate	9.08
Glycol Ethers	80.7

Perchloroethylene	0.47
Dichloromethane	2.04
Toluene	0.31
Manganese	0.08
Nickel	0.09
Chromium	0.04
TOTAL	92.8

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ and VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on March 25, 1998 has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F151-8993-00035; issued on March 25, 1998).

	Potential to Emit After Issuance (tons/year)						
Process/Facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) Paint Booth B1	Less than 2.23	Less than 2.23	--	Less than 98.8	--	--	Less than 9.4 for a single HAP and less than 23.5 for combined HAPs
Three (3) Paint Booths B2, B3, and B4	Less than 26.8	Less than 26.8	--		--	--	
Two (2) Glue Stations	0.25	0.25	--		--	--	
Three (3) Woodworking Operations	Less than 0.24	Less than 0.24	--	--	--	--	--
Welding and Cutting Operations	38.0	38.0	--	--	--	--	0.12

	Potential to Emit After Issuance (tons/year)						
Process/Facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
NG Combustion Units (insignificant)	0.16	0.16	0.01	0.12	1.78	2.12	Negligible
Four (4) Lift Trucks (Insignificant)	Negligible	Negligible	Negligible	Negligible	0.04	0.01	Negligible
Total Emissions	Less than 67.7	Less than 67.7	0.01	Less than 99.0	1.82	2.13	Less than 10 for a single HAP and less than 25 for combined HAPs

County Attainment Status

The source is located in Steuben County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Steuben County has been designated as attainment or unclassifiable for ozone.
- (b) Steuben County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The source does not perform surface coating operations to metal furniture. Therefore, the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not applicable.
- (c) The source does not perform metal coil surface coating operations. Therefore, the New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460 - 60.466, Subpart TT) are not applicable.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (e) The source does not manufacture any wood furniture. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) are not applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source was constructed in 1995 and modified in December, 1997. The source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(y)(1) and the potential to emit of any regulated pollutant before control is less than two hundred and fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The source was modified after July 27, 1997 and has the potential HAP emissions greater than the major HAP thresholds. However, the source has agreed to limit the HAP emissions from the entire source to less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-8-4 (FESOP)

The potential VOC and PM₁₀ emissions from the entire facility are greater than 100 tons per year and the potential HAP emissions from the entire source are greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. Pursuant to FESOP 151-8993-00035, issued on March 25, 1998 and 326 IAC 2-8-4, the following limitations have been included in the proposed permit:

- (a) The amount of VOC delivered to all the spray painting booths, the glue application stations, and their associated clean-up activities shall not exceed a total of 98.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any single HAP delivered to all the spray painting booths and the glue application stations plus the amount of any single HAP used for clean-up shall not exceed 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to all the spray painting booths and the glue application stations plus the amount of any combination of HAPs used for clean-up shall not exceed 23.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The above limits for the surface coating activities, combined with the emissions from the woodworking, welding, flame cutting, and insignificant activities, limit both the VOC and PM₁₀ emissions from the entire source to less than 100 tons per year each and limit the HAP emissions to less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. The use of dry filters for the spray booths (B1, B2, B3, and B4) ensures the PM₁₀ emissions from the entire source are less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Steuben County and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Four (4) Spray Painting Booths (B1, B2, B3, and B4)

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

These painting booths perform the metal coating process and the source is under the Standard Industrial Classification Code of major group #37. In addition, the source was constructed after July 1, 1990 and each coating booth has actual VOC emissions greater than 15 pounds per day. Therefore, these booths are subject to 326 IAC 8-2-9 and the have the following requirements:

- (a) The VOC content of the coatings applied to this facility shall not exceed three and five tenths (3.5) pounds VOC per gallon of extreme performance coatings, excluding water, delivered to the applicators.
- (b) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the Permittee, the VOC content of the coating delivered to the spray painting booths is in compliance with the requirements above.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Since the requirements of 326 IAC 8-2-9 apply to these painting booths, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Steuben and was constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 are not applicable.

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the spray painting booths (B1, B2, B3, and B4) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from these four (4) spray painting booths (B1, B2, B3, and B4) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

State Rule Applicability - Two (2) Glue Application Stations

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The actual VOC emissions from each of the glue application stations are less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable to these units. Any change or modification which may increase the actual VOC emissions from each glue application station to greater than 15 pounds per day must be approved by OAQ before any such change may occur.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential uncontrolled VOC emissions from each of the glue application stations are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these units.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Steuben and was constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 are not applicable.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the glue application stations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The coating usage for each of the glue application stations is less than 5 gallons per day. These two glue application stations will be exempt from the requirements of 326 IAC 6-3-2 after the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

State Rule Applicability - Three Woodworking Operations (FS1, FS2, and FS3)

326 IAC 6-3-2 (Manufacturing Processes)

The allowable particulate emissions from each woodworking operation shall be limited to 0.39 lbs/hr when the process weight rate is 60 lbs/hr.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

According to the emission calculations (see Appendix A), the potential to emit PM after control from each woodworking operation is less than the limit in the table above. Therefore, these woodworking operations are in compliance with 326 IAC 6-3-2. The use of baghouses with control efficiencies of 99% ensures compliance with the particulate limit above.

State Rule Applicability - Welding and Flame-Cutting Operations

326 IAC 6-3-2 (Manufacturing Processes)

The welding operations at this source consume more than 625 pounds of wire per day and the flame cutting operations process more than 3,400 inches per hour of stock. Therefore, the welding and cutting operations are subject to 326 IAC 6-3. Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from each of the welding and flame-cutting processes shall be limited the pounds per hour limitation calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Testing Requirements

No stack test is required for this source because compliance with the FESOP limits for VOC and HAP can be determined by evaluating MSDSs and keeping records of the amount of VOC and HAPs applied. The use of dry filters, baghouses, and cyclones ensures compliance with 326 IAC 6-3 (Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The following new compliance requirements were incorporated into this FESOP:

1. The woodworking operations (FS1, FS2, and FS3), have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the stack exhausts from each baghouse or cyclone shall be performed once per shift during normal daylight operations when venting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the

appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (b) An inspection shall be performed calendar quarter of all bags and cyclones controlling the woodworking operations (FS1, FS2, and FS3) when venting into atmosphere. A baghouse or cyclone inspection shall be performed within the last month of each calendar quarter.
- (c) In the event that bag failure has been observed for the baghouses:
 - (1) for multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit.
 - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.
- (d) In the event that cyclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These conditions are necessary because the baghouses and cyclones, which are used to control the PM emissions from the woodworking operations, must operate properly to ensure compliance with 326 IAC 6-3 (Manufacturing Processes) and 326 IAC 2-8 (FESOP).

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The spray painting booths (B1, B2, B3, and B4) have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray painting booth stacks (V1, V2, V3, and V4) while one or more of the booths are in operation.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filers must function properly to ensure compliance with 40 CFR 52, Subpart P and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this material handling products and loading dock equipment manufacturing plant shall be subject to the conditions of the attached FESOP No.: F151-15780-00035.

Appendix A: Emission Calculations**VOC and PM/PM10 Emissions****From the Spray Paint Booth B1****Company Name: Vestil Manufacturing Corporation****Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703****FESOP: 151-15780-00035****Reviewer: ERG/YC****Date: July 7, 2002**

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	*PM/PM10 Potential (lb/hr)	*PM/PM10 Potential (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/yr)
Yellow Gloss	9.1	60.00%	49.2%	10.8%	10.0	0.2	0.98	1.97	47.17	8.61	2.55	11.16	65%	80%	0.51	2.23
Total								1.97		8.61	2.55	11.16			0.51	2.23

*Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) x (1 ton/2000 lbs)

Appendix A: Emission Calculations**HAP Emissions****From the Spray Paint Booth B1****Company Name: Vestil Manufacturing Corporation****Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703****FESOP: 151-15780-00035****Reviewer: ERG/YC****Date: July 7, 2002**

Material	Density (Lb/Gal)	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Weight % Dibutyl Phthalate	Dibutyl Phthalate Emissions (tons/yr)	Weight % Glycol Ethers	Glycol Ethers Emissions (tons/yr)
Yellow Gloss	9.1	10.0	0.2	0.83%	0.66	7.30%	5.82
Total					0.66		5.82

Total HAPs**6.48 tons/yr****METHODOLOGY**

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From Three (3) Spray Paint Booths (B2, B3, and B4)

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: 151-15780-00035
Reviewer: ERG/YC
Date: July 7, 2002

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	*PM/PM10 Potential (lb/hr)	*PM/PM10 Potential (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/yr)
Yellow Gloss	9.1	60.00%	49.2%	10.8%	2.0	4.0	0.98	7.86	188.70	34.44	10.19	44.64	65%	80%	2.04	8.93
Blue Gloss	9.0	60.02%	48.6%	11.4%	2.0	4.0	1.03	8.22	197.34	36.01	10.07	44.13	65%	80%	2.01	8.83
Brown Gloss	9.1	60.03%	48.6%	11.4%	2.0	4.0	1.04	8.32	199.70	36.45	10.18	44.61	65%	80%	2.04	8.92
**Total for each booth (worst case)								8.32		36.45	10.19	44.64			2.04	8.93
Total for 3 booths										109.34		133.92				26.78

*Assume all the PM emissions are PM10 emissions.

** Only one type of coating can be applied for each booth at the same time. Therefore, the worst case scenario is using the highest VOC/PM content coating.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) x (1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emissions
From Three (3) Spray Paint Booths (B2, B3, and B4)

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: 151-15780-00035
Reviewer: ERG/YC
Date: July 7, 2002

Material	Density (Lb/Gal)	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Weight % Dibutyl Phthalate	Dibutyl Phthalate Emissions (tons/yr)	Weight % Glycol Ethers	Glycol Ethers Emissions (tons/yr)
Yellow Gloss	9.1	2.0	4.0	0.83%	2.65	7.30%	23.28
Blue Gloss	9.0	2.0	4.0	0.89%	2.81	7.91%	24.94
Brown Gloss	9.1	2.0	4.0	0.88%	2.81	7.54%	24.04
*Total for each booth (worst case)					2.81		24.94
Total for 3 booths					8.42		74.83

* Only one type of coating can be applied for each booth at the same time. Therefore, the worst case scenario is using the highest HAP content coating.

Total HAPs

83.26 tons/yr

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From Two(2) Glue Application Stations

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: 151-15780-00035
Reviewer: ERG/YC
Date: July 7, 2002

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	*PM/PM10 Potential (lb/hr)	*PM/PM10 Potential (ton/yr)	Transfer Efficiency
Flexible Foam Adhesive	10.0	77.00%	0.0%	77.0%	0.359	0.2	7.70	0.55	13.27	2.42	0.06	0.25	65%
Total								0.55		2.42	0.06	0.25	

*Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emissions
From Two(2) Glue Application Stations

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: 151-15780-00035
Reviewer: ERG/YC
Date: July 7, 2002

Material	Density (Lb/Gal)	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Weight % Perchloroethylene	Perchloroethylene Emissions (tons/yr)	Weight % Dichloromethane	Dichloromethane Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)
Flexible Foam Adhesive	10.0	0.359	0.2	15.0%	0.47	65.0%	2.04	10.0%	0.31
Total					0.47		2.04		0.31

Total HAPs

2.83
tons/yr

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM/PM10 Emissions
From Woodworking Operations (FS1, FS2, FS3)

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: 151-15780-00035
Reviewer: ERG/YC
Date: July 7, 2002

Woodworking Process Description:

Units: One Radial Cross Cut Saw (SF1), One Radial Arm Saw (SF2), and One Routing Saw (SF3)
 Max. Throughput Rate: 60 pounds of wood per unit
 PM Control Equipment: baghouses
 Dust collected: 1.8 lbs/hr/unit
 Control Efficiency: 99.0%

1. Potential Uncontrolled Emissions for each unit:

Hourly PM/PM10 Emissions = 1.8 lbs/hr / 99% =	1.82 lbs/hr/unit
Annual PM/PM10 emissions = 1.82 lbs/hr x 8760 hr/yr x 1/2000 (ton/lb) =	7.96 tons/yr/unit

2. Potential to Emit after Control for each unit:

Hourly Potential to Emit = 1.82 lbs/hr x (1 - 99%) =	0.02 lbs/hr/unit
Annual Potential to Emit = 1.82 lbs/hr x (1 - 99%) x 8760 hr/yr x 1 ton/2000 lbs =	0.08 tons/yr/unit

3. Total Emissions from Woodworking Operations:

Potential Uncontrolled PM/PM10 Emissions = 7.96 tons/yr/unit x 3 units =	23.89 tons/yr
Potential to Emit of PM/PM10 = 0.08 tons/yr/unit x 3 units =	0.24 tons/yr

Note: This emission calculations for woodworking process is copied from the Technical Support Document (TSD) for FESOP # 151-8993-00035, issued March 25, 98.

Appendix A: Emission Calculations
PM and HAP Emissions
From Welding and Flame Cutting Operations

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: 151-15780-00035
Reviewer: ERG/YC
Date: July 7, 2002

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	51	3.5		0.0241	0.000034		0.00001	4.302	0.006	0	0.001785	0.008
Metal Inert Gas (MIG)(aluminum)	6	2.0		0.0723	0.000034		0.00001	0.868	0.000	0	0.00012	0.001

	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS* (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
FLAME CUTTING												
Oxyacetylene	41	0.75	11.7	0.1622	0.0005	0.0001	0.0003	3.501	0.011	2.2E-03	0.006	0.019

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPS
Potential Emissions (lbs/hr)	8.67	0.017	0.002	0.008	0.03
Potential Emissions (lbs/day)	208.10	0.414	0.052	0.201	0.67
Potential Emissions (tons/year)	37.98	0.076	0.009	0.037	0.12

METHODOLOGY

Welding emissions (lb/hr) = (# of stations) x (max. lbs of electrode used/hr/station) x (emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions (lb/hr) = (# of stations) x (max. metal thickness, in.) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Plasma cutting emissions (lb/hr) = (# of stations) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Emissions (lbs/day) = emissions (lbs/hr) x 24 hrs/day

Emissions (tons/yr) = emissions (lb/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Insignificant Combustion Units

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: 151-15780-00035
Reviewer: ERG/YC
Date: July 7, 2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.84 (16 Units combined)

42.4

	Pollutant					
	PM*	PM10*	SO ₂	**NO _x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	0.16	0.16	0.01	2.12	0.12	1.78

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations

From Four (4) Propane Fired Fork Lift Trucks (FT1-FT4) (Insignificant)

Company Name: Vestil Manufacturing Corporation
 Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
 FESOP: 151-15780-00035
 Reviewer: ERG/YC
 Date: July 7, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	Sulfur Content (gr/100 ft ³)
0.056 (total for 2 trucks)	5.4	0.01

	Pollutant					
Emission Factor in lb/kgal	PM*	PM10*	SO ₂ 0.001 (0.10S)	NO _x 14	VOC 0.5	CO 1.9
Potential Emission in tons/yr	1.1E-03	1.1E-03	2.7E-06	0.04	1.3E-03	0.01

*PM and PM10 emission factors are condensable and filterable PM10 combined.

Methodology

1 gallon of propane has a heating value of 91,500 Btu.

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.0915 MMBtu

Emission Factors from AP-42, Chapter 1.5-1, Table 1.5-1, SCC #1-03-010-02.(AP-42 Supplement B 10/96)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton